UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Adora King	
Ansel Santiago	72017 SEP 25 PM 3: 21 CV
Write the full name of each plaintiff.	(Include case number if one has been assigned)
against~e die a each	COMPLAINT
Alonzo Vernon, GABRIEL CRUZ, JUSTIN RESTIGE	(Prisoner)
Larry Padgett, Kenneth Mercado	Do you want a jury trial? ✓ Yes □ No
the contract Average of the contract of the co	
The Control of the Co	
Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please	
write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.	all the second of the second o

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

State below the federal legal basis for your claim, if known. This form is designed primarily for

I. LEGAL BASIS FOR CLAIM

prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).
Violation of my federal constitutional rights
□ Other:
II. PLAINTIFF INFORMATION Each plaintiff must provide the following information. Attach additional pages if necessary.
First Name Middle Initial Last Name
Shart King
State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.
Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)
Metropolitan Correctional Centers Current Place of Detention
Institutional Address
New York NY 10007 County, City State Zip Code
County, City State Zip Code III. PRISONER STATUS
Indicate below whether you are a prisoner or other confined person:
Pretrial detainee Civilly committed detainee Immigration detainee Convicted and sentenced prisoner
Other:

Page 2 Attachment	-		
II. Plaintiff Informa	tian		
Plaintiff #2:			
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PRISONER ID#			
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Metropolitan Correction	onal Center		
150 PARK ROW			
Institutional Address		hang	
New York, New York	NY	10007	
county/city	State	2TP Code	
III . PRISONER STATE	45		
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PAGE	3	Attack	inent
W	Det	Gendant	Information

Defendant 5: Alonzo Vernon Resister # 54755-054

Bureau of Prisons Inmate

Address unknown

	Case 1:17-cv-07310-CM			
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IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1:	Gabriel	CRUZ registe	p# 79103-054			
	First Name	Last Name	Shield #			
	Innate At M.C	.C. (Metropolitan C	prectional Center)			
	Current Job Title (or o	other identifying informat	ion)			
	150 PARK ROW					
	Current Work Addres		7			
	New York	NY	10007			
	County, City	State	Zip Code			
Defendant 2:	Justin	Rodriguez re	gister# 79105-054			
	First Name	Last Name	Shield #			
	Tunate At Motor	politan correctional	Centess			
		other identifying informat				
	150 PARK ROW					
	Current Work Addres	S				
	New York	W	10007			
	County, City	State	Zip Code			
Defendant 3:	Larry	Padsett				
	First Name	Last Name	Shield #			
	Innute At Metropolitan Correctional Center					
	Current Job Title (or other identifying information)					
•	150 Park Row					
	Current Work Addres	S ,				
	New York	NY	10007			
	County, City	State	Zip Code			
Defendant 4:	Kenneth Mer	cado				
Defendant 4.	First Name	Last Name	Shield #			
	Inmate At Metropolitan Correctional Center					
	Current Job Title (or other identifying information)					
•	150 Park Row					
	Current Work Addres	S				
	New York	NY	(0007			
	County, City	State	Zip Code			

V. STATEMENT OF CLAIM

Place(s) of occurrence: 150 PARK ROW NEW YORK, NY

Date(s) of occurrence: Setundary July 1, 2017 through August 31, 2017

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

On July 1, 2017 defendants Vernon, Roderauez, Cruz, Pa And Mercado Attacked and assaulted plaintiffs using various weapons Including sharpened metal screws, razons, chairs and Master combination locks while calling plaintitts a variety of discriminatory slurs facgots, Dillow-biters And sissies. engaged in A campaign of discriminatory and harassing behavior toward plaintiffs on the basis of plaintiffs perceived sexual preference. Defendant Rodriguez Attacked plaintiff King Striking him in the head with a Master combination lock in a sock and repeatedly plaintiff King in the head, face and body area while yelling "I hate you gay motherfuckers" and "tagget ass home ligger". Defendant Rodriguez did Also, during this same Attack, Strike plaintiff SANTIAGO with clenched fist inclinidually and in concept with defendants Mercado And Vernon while plaintiff Santiago Attempted to flee. Defendants Veryon, Padgett, Mercado and Cruz accosted and unlawfully IMPRISONED PLAINTIFFS IN A rOOM AT KNIFE point while defendant Rodriguez sodomized plaintiffs with A broom stick, struck plaintiff Santiago in his genitalia and testicles repeatedly and urinated on plaintiffs. Defendant Padgett, as the most senior leader of the crips street gang, of which all other defendants are also members

ordered defendants podriguez, Cruz, Vernay and Mercado to carry out
this Attack and did Also participate striking plaintiff King in the head
with clenched fist chairs and Kicking, punching and storiping plaintiff
King to the ground with the help of the other defendants. All defendants
did over the cause of the following two months in homes, spit on
And ASSAUL plaintites during various encounters with defamatory sluns
referencing plaintiffs rumored sexual preference. On August 16,2017 defendant
Parkett used string and batteries to create an impromptul aunching
mechanism with which defendant Padgett then used to Fing feces at plaintiffs, relling
INJURIES:
If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.
Plaintiffs suffered 5 graficant mental and emotional travers us a result
of defendants actions including but not limited to post traumatic stress
disorder mixiety disorder and prince attacks. Plaintiffs also suffered confusions
to the lead, Allus and legs, concussions, lacerations and Abrasions to the eyes,
Moth, Arrs, legs and back. Plaintiff Santingo new suffers from consistent testicular
pain, blacking from his prais and back and headaches. Both plaintiffs are undergoing treatm
VI. RELIEF
State briefly what money damages or other relief you want the court to order.
Plaintiffs seek money danuages from defendants in the amount of
\$850,000.00 And reimburgement of court cost and filing fees.

VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

9-19-17	Adore Kene				
Dated	Plaintiff's Signature				
Adora	King				
First Name	Middle Initial	Last Name			
150 PARK ROW					
Prison Address		2			
Man York, NY	<i>N</i>	'	10007		
County, City	St	ate	Zip Code		

Date on which I am delivering this complaint to prison authorities for mailing: 9-19-17

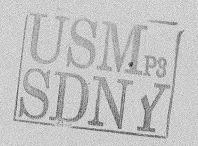
Co-Plainstiff:

Angel Sante
Plainstiff's Signature

First NAME Midde Initial LAST NAME J

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Metropolitan Correctional Center
150 Park Row
New York, N.4-10007





U.S. District Court, S.D.N.4 Attn: Pro Se Intake Unit 500 Pearl Street New York, N.4. 10007

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